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June 14, 2024

VIA ECF

Hon. Gary R. Brown, U.S.D.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Dawn White v. Intercontinental Capital Group, et al.
Docket No. 22-cv-4080 (GRB)(LGD)

Dear Judge Brown:

We represent plaintiff in the above-referenced case, and we write in response to the Court's Order of June 6, 2024, requiring a response to her letter. As an initial matter, we apologize for not submitting this yesterday; we were closed for religious observance on Wednesday and Thursday and did not realize it was overdue until this morning.

With respect to plaintiff's letter, as the Court is aware, a default judgment was entered against defendant in this matter earlier this year. As the Court instructed, we served a copy of that judgment on defendant shortly thereafter. Although defendant had inexplicably defaulted, failing to respond to either the lawsuit itself or to plaintiff's motion for default judgment, we anticipated that defendant would contact us after receiving notice of the judgment against it, and chose to give it some time to do so, in the hopes that we could recover without having to undertake formal collection efforts.

That was unsuccessful, however, and we have indeed begun those formal efforts. We have issued both bank restraining notices to various potential local banks as well as information subpoenas to defendant. If plaintiff's — or the Court's — concern is that we may have recovered money on this matter that we have not remitted it to plaintiff, we want to make clear that this did not occur. We have not yet obtained any recovery from defendant.

We have told our client on several occasions that we would contact her as soon as we had news to report to her. We understand her anxiousness, and will redouble our efforts to collect on the judgment so that she can recover the money she needs. We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Stein".

David Stein

cc: Dawn White (via email)